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November 16, 2018

**By Hand**

Honorable Judge Stuart M. Bernstein  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Re: In re Bernard L. Madoff - Case No. 08-01789 (SMB)  
Irving H. Picard v. Michael Mann, et al. - Adv. Pro. No. 10-04390 (SMB)

Dear Judge Bernstein:

As you are aware, Dentons filed a (A) *Notice of Motion and Motion to Withdraw the Reference* (B) *Defendants' Memorandum of Law in Support of Motion to Withdraw the Reference Pursuant to 28 U.S.C. § 157(d) and Fed. R. Bankr. P. 5011* and (C) *Declaration Of Carole Neville In Support of Defendants' Memorandum of Law in Support of Motion to Withdraw the Reference Pursuant to 28 U.S.C. § 157(d) and Fed. R. Bankr. P. 5011* in connection with the above-referenced adversary proceeding. The matter is now pending before Judge Broderick in the United States District Court as *Irving H. Picard v. BAM L.P. et al.*, 18-cv-09916 (VSB) and a briefing schedule has been ordered. The Trustee's response is due on November 30, 2018 and the Defendants' reply is due on December 17, 2018.

In view of the schedule set by the District Court, I respectfully request that the Court continue the trial of the adversary proceeding scheduled for December 3, 2018 pending the outcome of the motion. I apologize for any delay in requesting this continuance.

Sincerely,

Carole Neville

cc: Nicholas J. Cremona, Esq.

Absent the Trustee's consent,  
the defendant must move for a  
stay. See Fed. R. Bankr. P. 501(KC).  
So ordered: 11/16/18  
SMB  
USBJ